

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**Chapter 7**

**BOAZ BAGBAG,**

**Case No. 08-12667 (MEW)**

**Debtor.**

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**SUMMA CAPITAL CORP.,**

**Adv. Proc. No. 20-1185  
(MEW)**

**Plaintiff,**

**v.**

**BOAZ BAGBAG,**

**Defendant.**  
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**DECLARATION OF DAVID BOLTON IN SUPPORT  
OF APPLICATION SEEKING TO HOLD DEFENDANT AND HIS  
ATTORNEYS IN CONTEMPT OF COURT**

I, DAVID BOLTON, declare that:

1. I am the principal of David Bolton, P.C., counsel for plaintiff Summa Capital Corp. ("Summa").

2. I submit this declaration in support of Summa's motion, brought by Order to Show Cause, which seeks to hold debtor Boaz Bagbag and his counsel in contempt of court (ECF # 41).

3. I have read the Application submitted in support of the motion (ECF # 41) and declare under penalty of perjury under the laws of the United States of America that the factual statements contained therein are true and correct.

4. This application is brought by Order to Show Cause so that it can be heard at the Court's earliest opportunity to avoid the continuing accrual of harm to Summa and so that the Court can direct the manner and method of service on debtor's counsel.

5. No prior request for the relief sought on the Motion has been made to this or any other court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Garden City, New York  
June 8, 2021

\_\_\_\_/s/ David Bolton\_\_\_\_\_  
DAVID BOLTON